

CLOSED

**U.S. District Court  
District of South Carolina (Greenville)  
CRIMINAL DOCKET FOR CASE #: 6:23-cr-00634-KFM-1**

Case title: USA v. BROOKINS

Date Filed: 08/15/2023

Other court case number: 23-345 Eastern District of  
Pennsylvania

Date Terminated: 08/15/2023

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Assigned to: Magistrate Judge Kevin  
McDonald

**Defendant (1)****Cory Brookins***TERMINATED: 08/15/2023**also known as***Sport***TERMINATED: 08/15/2023*

represented by **Benjamin Thomas Stepp**  
Federal Public Defender's Office (Gvle)  
Two Liberty Square  
75 Beattie Place  
Suite 950  
Greenville, SC 29601  
864-235-8714  
Fax: 864-233-0188  
Email: benjamin\_stepp@fd.org  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*  
*Designation: Public Defender or*  
*Community Defender Appointment*

**Pending Counts**

None

**Disposition****Highest Offense Level (Opening)**

None

**Terminated Counts**

None

**Disposition****Highest Offense Level (Terminated)**

None

**Complaints****Disposition**

18:371 CONSPIRACY; 18:922(a)(1)(A)  
DEALING IN FIREARMS WITHOUT A  
LICENSE; FORFEITURE

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**Plaintiff**

**USA**

represented by **Christopher Braden Schoen**  
US Attorneys Office (Gville)  
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Greenville, SC 29601  
864-282-2100  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*  
*Designation: Assistant US Attorney*

Date Filed	#	Docket Text
08/15/2023	<a href="#">8</a>	Unsecured Bond Entered as to Cory Brookins in amount of \$ 25,000. (awil, ) (Entered: 08/16/2023)
08/15/2023	<a href="#">7</a>	<b>ORDER Setting Conditions of Release as to Cory Brookins (1). Bond is set at \$25,000 unsecured with no contact with victims or witnesses associated with this case. Defendant must appear in the charging district on Thursday, August 31 at 1:30 PM as instructed. Signed by Magistrate Judge Kevin McDonald on 8/15/23. (awil, )</b> (Entered: 08/16/2023)
08/15/2023	6	<b>TEXT ORDER APPOINTING FEDERAL PUBLIC DEFENDER Benjamin Thomas Stepp for Cory Brookins. Entered by Magistrate Judge Kevin McDonald on 8/15/23.(awil, )</b> (Entered: 08/16/2023)
08/15/2023	5	<b>Minute Entry for proceedings held before Magistrate Judge Kevin McDonald: Initial Appearance in Rule 5(c)(3) Proceedings as to Cory Brookins held on 8/15/2023. Defendant present in custody. Federal Public Defender Stepp present and appointed. Identity is not an issue. Defendant waived reading of charges and penalties. Bond is set at \$25,000 unsecured with no contact with victims or witnesses associated with this case. Defendant must appear in the charging district on Thursday, August 31 at 1:30 PM as instructed. Court Reporter Teresa Johnson. (awil, )</b> (Entered: 08/15/2023)
08/15/2023	4	<b>ORAL Order to Unseal as to Cory Brookins on oral motion by the government. Entered by Magistrate Judge Kevin McDonald on 8/15/23.(awil, )</b> (Entered: 08/15/2023)
08/15/2023	3	NOTICE OF HEARING as to Cory Brookins Initial Appearance - Rule 5c3 set for 8/15/2023 02:30 PM in Greenville #3100, Carroll A Campbell Jr Courthouse, 250 East North St, Greenville before Magistrate Judge Kevin McDonald. (awil, ) (Entered: 08/15/2023)
08/15/2023	<a href="#">2</a>	Rule 5c3 Documents Received as to Cory Brookins (awil, ) (Entered: 08/15/2023)

08/15/2023	1	Arrest (Rule 5c3) of Cory Brookins (awil, ) (Entered: 08/15/2023)
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AO 98 (Rev. 12/11) Appearance Bond

UNITED STATES DISTRICT COURT

for the

District of South Carolina

United States of America

v.

Cory Brookins  
Defendant

Case No. 6:23cr634

APPEARANCE BOND

Defendant's Agreement

I, \_\_\_\_\_ (defendant), agree to follow every order of this court, or any court that considers this case, and I further agree that this bond may be forfeited if I fail:

- ( X ) to appear for court proceedings;
- ( X ) if convicted, to surrender to serve a sentence that the court may impose; or
- ( X ) to comply with all conditions set forth in the Order Setting Conditions of Release.

Type of Bond

( ) (1) This is a personal recognizance bond.

( ☒ ) (2) This is an unsecured bond of \$ 25,000.

( ) (3) This is a secured bond of \$ \_\_\_\_\_, secured by:

( ) (a) \$ \_\_\_\_\_, in cash deposited with the court.

( ) (b) the agreement of the defendant and each surety to forfeit the following cash or other property  
(describe the cash or other property, including claims on it — such as a lien, mortgage, or loan — and attach proof of ownership and value):

\_\_\_\_\_  
If this bond is secured by real property, documents to protect the secured interest may be filed of record.

( ) (c) a bail bond with a solvent surety (attach a copy of the bail bond, or describe it and identify the surety):

Forfeiture or Release of the Bond

*Forfeiture of the Bond.* This appearance bond may be forfeited if the defendant does not comply with the above agreement. The court may immediately order the amount of the bond surrendered to the United States, including the security for the bond, if the defendant does not comply with the agreement. At the request of the United States, the court may order a judgment of forfeiture against the defendant and each surety for the entire amount of the bond, including interest and costs.

AO 98 (Rev. 12/11) Appearance Bond

*Release of the Bond.* The court may order this appearance bond ended at any time. This bond will be satisfied and the security will be released when either: (1) the defendant is found not guilty on all charges, or (2) the defendant reports to serve a sentence.

**Declarations**

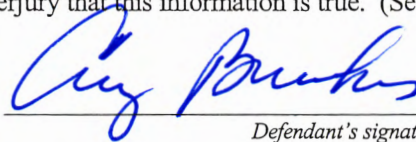
*Ownership of the Property.* I, the defendant – and each surety – declare under penalty of perjury that:

- (1) all owners of the property securing this appearance bond are included on the bond;
- (2) the property is not subject to claims, except as described above; and
- (3) I will not sell the property, allow further claims to be made against it, or do anything to reduce its value while this appearance bond is in effect.

*Acceptance.* I, the defendant – and each surety – have read this appearance bond and have either read all the conditions of release set by the court or had them explained to me. I agree to this Appearance Bond.

I, the defendant – and each surety – declare under penalty of perjury that this information is true. (See 28 U.S.C. § 1746.)

Date: \_\_\_\_\_

  
\_\_\_\_\_  
Defendant's signature

\_\_\_\_\_  
Surety/property owner – printed name

\_\_\_\_\_  
Surety/property owner – signature and date

\_\_\_\_\_  
Surety/property owner – printed name

\_\_\_\_\_  
Surety/property owner – signature and date

\_\_\_\_\_  
Surety/property owner – printed name

\_\_\_\_\_  
Surety/property owner – signature and date

CLERK OF COURT

Date: 8/15/23

  
\_\_\_\_\_  
Signature of Clerk or Deputy Clerk

Approved.

Date: 8/15/23

s/Kevin F. McDonald  
\_\_\_\_\_  
Judge's signature

UNITED STATES DISTRICT COURT  
for the  
District of South Carolina

United States of America  
v.

Case No.

6:23 cr 634

Cory Brooks  
Defendant

ORDER SETTING CONDITIONS OF RELEASE

IT IS ORDERED that the defendant's release is subject to these conditions:

- (1) The defendant must not violate federal, state, or local law while on release.
- (2) The defendant must cooperate in the collection of a DNA sample if it is authorized by 34 U.S.C. § 40702.
- (3) The defendant must advise the court or the pretrial services office or supervising officer in writing before making any change of residence or telephone number.
- (4) The defendant must appear in court as required and, if convicted, must surrender as directed to serve a sentence that the court may impose.

The defendant must appear at:

James A. Byrne US Courthouse  
Place

601 Market Street, Philadelphia, PA 19106

on Thursday, August 31 at 1:30pm (Courtroom 5A)  
Date and Time

If blank, defendant will be notified of next appearance.

- (5) The defendant must sign an Appearance Bond, if ordered.

Bond is set at \$25,000 unsecured with no contact with victims or witnesses associated with this case. Defendant must appear in the charging district on Thursday, August 31 at 1:30 PM as instructed.



**ADDITIONAL CONDITIONS OF RELEASE**

Pursuant to 18 U.S.C. § 3142(c)(1)(B), the court may impose the following least restrictive condition(s) only as necessary to reasonably assure the appearance of the person as required and the safety of any other person and the community.

IT IS FURTHER ORDERED that the defendant's release is subject to the conditions marked below:

☐ (6) The defendant is placed in the custody of:

Person or organization \_\_\_\_\_

Address (only if above is an organization) \_\_\_\_\_

City and state \_\_\_\_\_

Tel. No. \_\_\_\_\_

who agrees to (a) supervise the defendant, (b) use every effort to assure the defendant's appearance at all court proceedings, and (c) notify the court immediately if the defendant violates a condition of release or is no longer in the custodian's custody.

Signed: \_\_\_\_\_

Custodian

Date

☒ (7) The defendant must:

☒ (a) submit to supervision by and report for supervision to the \_\_\_\_\_, telephone number \_\_\_\_\_, no later than \_\_\_\_\_.

☒ (b) continue or actively seek employment.

☐ (c) continue or start an education program.

☒ (d) surrender any passport to: Probation as Directed

☒ (e) not obtain a passport or other international travel document.

☒ (f) abide by the following restrictions on personal association, residence, or travel: Not to leave South Carolina and/or the state of \_\_\_\_\_ except with permission of the US Pretrial or Probation Officer.

☒ (g) avoid all contact, directly or indirectly, with any person who is or may be a victim or witness in the investigation or prosecution, including: \_\_\_\_\_

☐ (h) get medical or psychiatric treatment: \_\_\_\_\_

☐ (i) return to custody each \_\_\_\_\_ at \_\_\_\_\_ o'clock after being released at \_\_\_\_\_ o'clock for employment, schooling, or the following purposes: \_\_\_\_\_

☐ (j) maintain residence at a halfway house or community corrections center, as the pretrial services office or supervising officer considers necessary.

☒ (k) not possess a firearm, destructive device, or other weapon.

☒ (l) not use alcohol ( ☐ ) at all ( ☒ ) excessively.

☒ (m) not use or unlawfully possess a narcotic drug or other controlled substances defined in 21 U.S.C. § 802, unless prescribed by a licensed medical practitioner.

☒ (n) submit to testing for a prohibited substance if required by the pretrial services office or supervising officer. Testing may be used with random frequency and may include urine testing, the wearing of a sweat patch, a remote alcohol testing system, and/or any form of prohibited substance screening or testing. The defendant must not obstruct, attempt to obstruct, or tamper with the efficiency and accuracy of prohibited substance screening or testing.

☒ (o) participate in a program of inpatient or outpatient substance abuse therapy and counseling if directed by the pretrial services office or supervising officer.

☐ (p) participate in one of the following location restriction programs and comply with its requirements as directed.

☐ (i) **Curfew.** You are restricted to your residence every day ( ☐ ) from \_\_\_\_\_ to \_\_\_\_\_, or ( ☐ ) as directed by the pretrial services office or supervising officer; or

☐ (ii) **Home Detention.** You are restricted to your residence at all times except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court-ordered obligations; or other activities approved in advance by the pretrial services office or supervising officer; or

☐ (iii) **Home Incarceration.** You are restricted to 24-hour-a-day lock-down at your residence except for medical necessities and court appearances or other activities specifically approved by the court; or

☐ (iv) **Stand Alone Monitoring.** You have no residential curfew, home detention, or home incarceration restrictions. However, you must comply with the location or travel restrictions as imposed by the court.

**Note:** Stand Alone Monitoring should be used in conjunction with global positioning system (GPS) technology.

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**ADDITIONAL CONDITIONS OF RELEASE**

- ( ☐ ) (q) submit to the following location monitoring technology and comply with its requirements as directed:
- ( ☐ ) (i) Location monitoring technology as directed by the pretrial services or supervising officer; or
  - ( ☐ ) (ii) Voice Recognition; or
  - ( ☐ ) (iii) Radio Frequency; or
  - ( ☐ ) (iv) GPS.
- ( ☒ ) (r) pay all or part of the cost of location monitoring based upon your ability to pay as determined by the pretrial services or supervising officer.
- ( ☒ ) (s) report as soon as possible, to the pretrial services or supervising officer, every contact with law enforcement personnel, including arrests, questioning, or traffic stops.
- ( ☒ ) (t) Remain under supervision of US Probation for the duration of this bond and follow any and all instructions given by the US Probation Officer.
- 
- Stay in touch with attorney.
-



**ADVICE OF PENALTIES AND SANCTIONS**

TO THE DEFENDANT:

YOU ARE ADVISED OF THE FOLLOWING PENALTIES AND SANCTIONS:

Violating any of the foregoing conditions of release may result in the immediate issuance of a warrant for your arrest, a revocation of your release, an order of detention, a forfeiture of any bond, and a prosecution for contempt of court and could result in imprisonment, a fine, or both.

While on release, if you commit a federal felony offense the punishment is an additional prison term of not more than ten years and for a federal misdemeanor offense the punishment is an additional prison term of not more than one year. This sentence will be consecutive (*i.e.*, in addition to) to any other sentence you receive.

It is a crime punishable by up to ten years in prison, and a \$250,000 fine, or both, to: obstruct a criminal investigation; tamper with a witness, victim, or informant; retaliate or attempt to retaliate against a witness, victim, or informant; or intimidate or attempt to intimidate a witness, victim, juror, informant, or officer of the court. The penalties for tampering, retaliation, or intimidation are significantly more serious if they involve a killing or attempted killing.

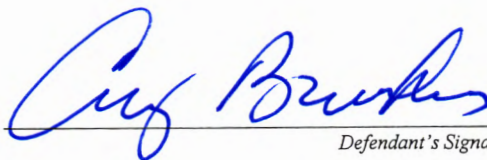
If, after release, you knowingly fail to appear as the conditions of release require, or to surrender to serve a sentence, you may be prosecuted for failing to appear or surrender and additional punishment may be imposed. If you are convicted of:

- (1) an offense punishable by death, life imprisonment, or imprisonment for a term of fifteen years or more – you will be fined not more than \$250,000 or imprisoned for not more than 10 years, or both;
- (2) an offense punishable by imprisonment for a term of five years or more, but less than fifteen years – you will be fined not more than \$250,000 or imprisoned for not more than five years, or both;
- (3) any other felony – you will be fined not more than \$250,000 or imprisoned not more than two years, or both;
- (4) a misdemeanor – you will be fined not more than \$100,000 or imprisoned not more than one year, or both.

A term of imprisonment imposed for failure to appear or surrender will be consecutive to any other sentence you receive. In addition, a failure to appear or surrender may result in the forfeiture of any bond posted.

**Acknowledgment of the Defendant**

I acknowledge that I am the defendant in this case and that I am aware of the conditions of release. I promise to obey all conditions of release, to appear as directed, and surrender to serve any sentence imposed. I am aware of the penalties and sanctions set forth above.



Defendant's Signature

City and State

**Directions to the United States Marshal**

- ( ☒ ) The defendant is ORDERED released after processing.  
( ☐ ) The United States marshal is ORDERED to keep the defendant in custody until notified by the clerk or judge that the defendant has posted bond and/or complied with all other conditions for release. If still in custody, the defendant must be produced before the appropriate judge at the time and place specified.

Date:

8/15/23

s/Kevin F. McDonald

Judicial Officer's Signature

US Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT**

USDC SC: 6:23cr634

UNITED STATES OF AMERICA : CRIMINAL NO. \_\_\_\_\_

v. \_\_\_\_\_ : DATE FILED: \_\_\_\_\_

**CORY BROOKINS** : **VIOLATIONS:**  
**a/k/a “Sport”** : **18 U.S.C. § 371 (conspiracy – 1 count)**  
: **18 U.S.C. § 922(a)(1)(A) (dealing in firearms**  
: **without a license – 1 count)**  
: **Notice of forfeiture**

**INDICTMENT**

**COUNT ONE**

## THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant CORY BROOKINS, a/k/a “Sport,” was not a federal firearms licensee (“FFL”), and was not authorized to deal, import, or manufacture firearms under federal law.
2. Terrance Darby, a/k/a “Tibbs,” a/k/a “Tibby,” charged elsewhere, was a resident of Philadelphia, Pennsylvania, was not a FFL, and was not authorized to deal, import, or manufacture firearms under federal law.
3. Ontavious Plumer, a/k/a “Toot,” charged elsewhere, was a resident of South Carolina, was not a FFL, and was not authorized to deal, import, or manufacture firearms under federal law.
4. Charlena West, charged elsewhere, was a resident of South Carolina, was not a FFL, and was not authorized to deal, import, or manufacture firearms under federal law.

5. Earlishia Brownlee, charged elsewhere, was a resident of South Carolina, was not a FFL, and was not authorized to deal, import, or manufacture firearms under federal law.

6. Darquis Davis, charged elsewhere, was a resident of South Carolina, was not a FFL, and was not authorized to deal, import, or manufacture firearms under federal law.

7. The following businesses possessed an FFL license and were authorized to deal in firearms under federal laws:

<b>FFL</b>	<b>Location</b>
Anderson Gun and Pawn	1309 South Murray Avenue, Anderson, South Carolina
Grady's Great Outdoors	3440 Clemson Boulevard, Anderson, South Carolina
Academy Sports + Outdoors #154	3423 Clemson Boulevard, Anderson, South Carolina
B&B Sporting Goods and Pawn	2001 South Main Street, Anderson, South Carolina
Palmetto State Armory - Greenville	1040A Woodruff Road, Greenville, South Carolina
Palmetto State Armory - Columbia	3760 Fernandina Road, Columbia, South Carolina
Sportsman's Warehouse	3795 Clemson Boulevard, Anderson, South Carolina
South Carolina Gun Company	242 West Wade Hampton Boulevard, Greer, South Carolina
City Arsenal	1210 Poinsett Highway, Greenville, South Carolina

8. FFL holders are licensed, among other things, to sell firearms. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms.

9. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473 ("Form 4473"). Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on Form 4473 are true and correct. The Form 4473 requires that the prospective



purchaser certify truthfully, subject to penalties of perjury, that he or she was the actual buyer of the firearm. The Form 4473 contains the following language in bold type: “Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you.” In the certification section of the Form 4473, the actual buyer must certify that his or her answers to the questions on the form are “true, correct, and complete,” and acknowledge by his or her signature that “making any false oral or written statement . . . is a crime punishable as a felony under Federal law, and may also violate State and/or local law.”

10. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer’s home address and date of birth, to ensure that the person was not prohibited from purchasing a firearm.

11. A person who purchases a firearm at the behest of another person and falsely states on the Form 4473 that he or she is the actual buyer of the firearm is known as a “straw purchaser.”

12. From at least as early as in or around November 2020 through in or around February 2021, in in the Eastern District of Pennsylvania, the District of South Carolina, and elsewhere, defendant

**CORY BROOKINS,**  
**a/k/a “Sport,”**

conspired and agreed with Terrance Darby, a/k/a “Tibbs,” a/k/a “Tibby”; Ontavious Plumer, a/k/a “Toot”; Charlena West, Earlishia Brownlee and Darquis Davis, each charged elsewhere; and others known and unknown to the grand jury, to commit offenses against the United States, that is, to engage in the business of dealing firearms without being licensed to do so, in violation

of Title 18, United States Code, Section 922(a)(1)(A); and to make a false statement with respect to the information required to be kept in the records of a federally licensed firearms dealer, in violation of Title 18, United States Code, Section 924(a)(1)(A).

#### **MANNER AND MEANS**

It was part of the conspiracy that:

13. Ontavious Plumer instructed Charlena West and Earlishia Brownlee to purchase firearms at FFLs in South Carolina, with the intention that these firearms would be transported to defendant CORY BROOKINS and Terrance Darby in Philadelphia, Pennsylvania.

14. Ontavious Plumer paid Charlena West and Earlishia Brownlee using mobile banking applications, including Cash App, to purchase firearms from FFLs in South Carolina.

15. Charlena West and Earlishia Brownlee purchased firearms from federally licensed firearms dealers in South Carolina, knowing that the firearms were being purchased for other individuals and that these firearms would be transported to Philadelphia and given to defendant CORY BROOKINS and Terrance Darby.

16. Charlena West and Earlishia Brownlee falsely stated on the Form 4473 for each firearm purchase that they were the actual purchaser of the firearms, when in fact they knew this statement was false and they purchased the firearms for others, including defendant CORY BROOKINS and Terrance Darby.

17. Ontavious Plumer communicated with defendant CORY BROOKINS and Terrance Darby about the purchases of the firearms by Charlena West and Earlishia Brownlee, and coordinated the transport by West and Darquis Davis of these firearms from South Carolina to Philadelphia, Pennsylvania.

18. Charlena West and Darquis Davis traveled from South Carolina to Philadelphia, Pennsylvania with the firearms and transferred the firearms to defendant CORY BROOKINS and Terrance Darby.

19. Defendant CORY BROOKINS and Terrance Darby received the purchased firearms and planned to resell the firearms.

### OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania, the District of South Carolina, and elsewhere:

1. On or about November 20 and November 21, 2020, at the direction of Ontavious Plumer, Charlena West purchased the following firearms:

<b>Date of Purchase</b>	<b>Federal Firearms Licensee</b>	<b>Firearm</b>	<b>Serial Number</b>	<b>Purchaser</b>
11/20/2020	Anderson Gun and Pawn	Beretta, model APX, 9mm semi-automatic pistol	A098483X	Charlena West
11/20/2020	Anderson Gun and Pawn	Beretta, model APX, 9mm semi-automatic pistol	A098465X	Charlena West
11/20/2020	Grady's Great Outdoors	Taurus, Judge series, .45 caliber revolver	ABL097569	Charlena West
11/20/2020	Grady's Great Outdoors	Taurus, Judge series, .45 caliber revolver	ABJ941959	Charlena West
11/20/2020	Grady's Great Outdoors	Taurus, Judge series, .45 caliber revolver	ABK062912	Charlena West
11/20/2020	Grady's Great Outdoors	Taurus, model G3, 9mm semi-automatic pistol	ABJ945226	Charlena West
11/21/2020	Grady's Great Outdoors	Smith & Wesson, model SD40, .40 caliber semi-automatic pistol	FCU0160	Charlena West
11/21/2020	Grady's Great Outdoors	Smith & Wesson, model SD40, .40 caliber semi-automatic pistol	FCW3015	Charlena West
11/21/2020	Grady's Great Outdoors	Ruger, Security-9, 9mm semi-automatic pistol	383-61872	Charlena West



11/21/2020	Academy Sports + Outdoors # 154	Smith & Wesson, model MP40, .40 caliber semi-automatic pistol	JFN7241	Charlena West
11/21/2020	Academy Sports + Outdoors # 154	Ruger, Security-9, 9mm semi-automatic pistol	383-84606	Charlena West
11/21/2020	Academy Sports + Outdoors # 154	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCU8997	Charlena West
11/21/2020	Academy Sports + Outdoors # 154	Ruger, Security-9, 9mm semi-automatic pistol	383-69030	Charlena West

2. On or about November 27 and November 28, 2020, at the direction of

Ontavious Plumer, Charlena West and Earlishia Brownlee purchased the following firearms:

<b>Date of Purchase</b>	<b>Federal Firearms Licensee</b>	<b>Firearm</b>	<b>Serial Number</b>	<b>Purchaser</b>
11/27/2020	Grady's Great Outdoors	Glock, model 48, 9mm semi-automatic pistol	BRUD021	Charlena West
11/27/2020	Grady's Great Outdoors	Smith & Wesson, model SD9, 9mm semi-automatic pistol	FCJ0371	Charlena West
11/27/2020	Grady's Great Outdoors	Smith & Wesson, model SD40, .40 caliber semi-automatic pistol	FCR2029	Charlena West
11/27/2020	B&B Sporting Goods and Pawn	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	HEY8477	Charlena West
11/27/2020	B&B Sporting Goods and Pawn	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FBB2962	Charlena West
11/27/2020	B&B Sporting Goods and Pawn	Smith & Wesson, model 4040, .40 caliber semi-automatic pistol	USC9960	Charlena West
11/27/2020	Palmetto State Armory - Greenville	Glock, model 44, .22 caliber semi-automatic pistol	AEMA839	Earlishia Brownlee
11/27/2020	Palmetto State Armory - Greenville	Glock, model 43, 9mm semi-automatic pistol	AEWG856	Earlishia Brownlee
11/27/2020	Palmetto State Armory - Greenville	Glock, model 43, 9mm semi-automatic pistol	AEWV822	Earlishia Brownlee
11/28/2020	Palmetto State Armory - Greenville	Smith & Wesson, model SD9VE, 9mm semi-automatic pistol	FCV9142	Charlena West

11/28/2020	B&B Sporting Goods and Pawn	Glock, model 44, .22 caliber semi-automatic pistol	AEHK404	Earlishia Brownlee
11/28/2020	B&B Sporting Goods and Pawn	Glock, model 44, .22 caliber semi-automatic pistol	AEFZ395	Earlishia Brownlee
11/28/2020	B&B Sporting Goods and Pawn	Smith & Wesson, model 4046, .40 caliber semi-automatic pistol	TDS8937	Earlishia Brownlee
11/28/2020	B&B Sporting Goods and Pawn	Smith & Wesson, model M&P 45, .22 caliber semi-automatic pistol	HST6669	Earlishia Brownlee

3. On or about December 27, 2020, Terrance Darby told Ontavious Plumer that Darby had requests for FN firearms, and asked if Plumer was “still able to make it happen.” Plumer responded that he could “make it happen” and quoted Darby a price of “12-1600” for “the ones that shoot 9 mm bullets.”

4. In late December 2020 and early January 2021, Ontavious Plumer and Terrance Darby agreed that Plumer would supply guns to Darby in Philadelphia for approximately \$6,800, in exchange for Darby sending controlled substances to South Carolina.

5. On or about January 8, 2021, at the direction of Ontavious Plumer, Charlena West and Earlishia Brownlee purchased the following firearms:

Date of Purchase	Federal Firearms Licensee	Firearm	Serial Number	Purchaser
1/8/2021	Sportsman’s Warehouse	Glock, model 19, 9mm semi-automatic pistol	BNYP686	Charlena West
1/8/2021	Sportsman’s Warehouse	Beretta, model APX, 9mm semi-automatic pistol	A118611X	Charlena West
1/8/2021	Grady’s Great Outdoors	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCR9812	Charlena West
1/8/2021	Grady’s Great Outdoors	Taurus, model G3, 9mm semi-automatic pistol	ABN377437	Charlena West
1/8/2021	Grady’s Great Outdoors	Glock, model 19, 9mm semi-automatic pistol	BEBG379	Charlena West
1/8/2021	Grady’s Great Outdoors	Smith & Wesson, M&P9 Shield, 9mm semi-automatic pistol	RJL8351	Earlishia Brownlee

1/8/2021	Grady's Great Outdoors	Glock, model 43, 9mm semi-automatic pistol	RJL9085	Earlishia Brownlee
1/8/2021	Grady's Great Outdoors	Glock, model 43, 9mm semi-automatic pistol	RJJ3740	Earlishia Brownlee

6. On or about January 8, 2021, Ontavious Plumer told Terrance Darby, "Asa hit me I'm coming your way tomorrow wit straps n I need da dog." Darby asked in response, "What u bringing?" Plumer responded that he would try to obtain 10 firearms, and Darby responded, "... hope all new. Don't wanna get stuck wit nothing used."

7. On or about January 9, 2021:

a. Ontavious Plumer told Terrance Darby that he had "8 total."

Plumer told Darby that it would cost "6800 for da 8 guns."

b. At the direction of Ontavious Plumer, Charlena West transported firearms by car from South Carolina to Philadelphia, Pennsylvania and gave the firearms to Terrance Darby.

8. On or about January 10, 2021, Ontavious Plumer told Earlishia Brownlee to purchase certain firearms, to which Brownlee responded, "Okay."

9. On or about January 10 and January 11, 2021, at the direction of Ontavious Plumer, Earlishia Brownlee purchased the following firearms:

Date of Purchase	Federal Firearms Licensee	Firearm	Serial Number	Purchaser
1/10/2021	Palmetto State Armory - Greenville	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCL3090	Earlishia Brownlee
1/10/2021	Palmetto State Armory - Greenville	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCR1969	Earlishia Brownlee
1/11/2021	Anderson Gun and Pawn	Kahr, model CW45, .45 caliber semi-automatic pistol	SG3002	Earlishia Brownlee

10. On or about January 12, 2021, Ontavious Plumer told Terrance Darby that



he had firearms, and that these firearms would be transported to Darby. Plumer asked Darby for a “pay advance.”

11. On or about January 13, 2021, at the direction of Ontavious Plumer, Charlena West and Darquis Davis transported firearms by car from South Carolina to Philadelphia, Pennsylvania, and gave the firearms to Terrance Darby.

12. On or about January 14, 2021, at the direction of Ontavious Plumer, Charlena West purchased the following firearms:

<b>Date of Purchase</b>	<b>Federal Firearms Licensee</b>	<b>Firearm</b>	<b>Serial Number</b>	<b>Purchaser</b>
1/14/2021	South Carolina Gun Company	Smith & Wesson, model MP40, .40 caliber semi-automatic pistol	NEJ0435	Charlena West
1/14/2021	South Carolina Gun Company	Smith & Wesson, model MP40, .40 caliber semi-automatic pistol	HLH1207	Charlena West
1/14/2021	South Carolina Gun Company	Smith & Wesson, model MP40, .40 caliber semi-automatic pistol	HLL8291	Charlena West

13. On or about January 15, 2021, Ontavious Plumer sent Terrance Darby photographs of three firearms, and told Darby that these were “all 40s.” Plumer told Darby that he would be “getting [the] rest in the am” and that these firearms would cost \$1,100. Darby confirmed that he wanted these firearms. Plumer responded that he would pick up some more “hardware” and then would be “hitting road.”

14. On or about January 17, 2021, at the direction of Ontavious Plumer, Charlena West purchased the following firearms:

<b>Date of Purchase</b>	<b>Federal Firearms Licensee</b>	<b>Firearm</b>	<b>Serial Number</b>	<b>Purchaser</b>
1/17/2021	Palmetto State Armory - Columbia	Smith & Wesson, model SD9VE, 9mm semi-automatic pistol	FCN8128	Charlena West

1/17/2021	Palmetto State Armory - Columbia	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCZ6643	Charlena West
1/17/2021	Palmetto State Armory - Columbia	Taurus, model GC3, 9mm semi-automatic pistol	ABN361120	Charlena West

15. On or about January 17, 2021, Ontavious Plumer told defendant CORY BROOKINS that he had six brand new firearms for \$7,200. Plumer told defendant CORY BROOKINS that the firearms were on the way to be delivered to BROOKINS.

16. On or about January 18, 2021, Ontavious Plumer told Terrance Darby that the firearms were being transported to "your city." Plumer then asked Darby if he had "ice," to which Darby responded that it would cost \$5,000 per bag.

17. On or about January 18, 2021, at the direction of Ontavious Plumer, Charlena West and Darquis Davis transported firearms by car from South Carolina to Philadelphia, Pennsylvania and gave the firearms to Terrance Darby. Defendant CORY BROOKINS was present when West and Davis gave some of the firearms to Darby.

18. On January 21 and 22, 2021, Terrance Darby sent defendant CORY BROOKINS numerous photographs of numerous firearms, including a Smith & Wesson, model SD40VE, ~~.40~~<sub>.40</sub> caliber semiautomatic pistol bearing serial number FCL3090 that was purchased by Earlishia Brownlee on January 10, 2021; a Smith & Wesson, model M&P40, .40 caliber semiautomatic pistol bearing serial number NEJ0435 that was purchased by Charlena West on January 14, 2021; and a Taurus, model G3, 9mm semiautomatic pistol bearing serial number ABN361120 that was purchased by West on January 17, 2021. Darby said to defendant BROOKINS, "I'm in," and defendant BROOKINS said, "Bet."

19. On or about January 21, 25 and 26, 2021, at the direction of Ontavious Plumer, Charlena West and Earlishia Brownlee purchased the following firearms:

<b>Date of Purchase</b>	<b>Federal Firearms Licensee</b>	<b>Firearm</b>	<b>Serial Number</b>	<b>Purchaser</b>
1/21/2021	B&B Sporting Goods and Pawn	Ruger, model SR9c, 9mm semi-automatic pistol	339-18799	Earlishia Brownlee
1/21/2021	B&B Sporting Goods and Pawn	Smith & Wesson, model M&P, semi-automatic pistol	NFD1490	Earlishia Brownlee
1/25/2021	Anderson Gun and Pawn	Springfield Defender, 9mm semi-automatic pistol	BY565525	Earlishia Brownlee
1/25/2021	Anderson Gun and Pawn	Smith & Wesson, model MP40C, .40 caliber semi-automatic pistol	HRX7505	Earlishia Brownlee
1/25/2021	B&B Sporting Goods and Pawn	Ruger, model 9E, 9mm semi-automatic pistol	338-1248	Earlishia Brownlee
1/25/2021	B&B Sporting Goods and Pawn	Smith & Wesson, model SW9GVE, 9mm semi-automatic pistol	PB23904	Earlishia Brownlee
1/26/2021	B&B Sporting Goods and Pawn	Taurus, model G2C, 9mm semi-automatic pistol	ABL194818	Charlena West

20. On or about January 25 and 26, 2021, Ontavious Plumer and Charlena West discussed purchasing firearms and transporting them to Philadelphia, Pennsylvania. On January 26, 2021, Plumer told West to purchase firearms and drive to Philadelphia. West responded that he/she was on his/her way to Philadelphia with firearms. Plumer told West that he/she would be meeting defendant CORY BROOKINS, and provided BROOKINS's cell phone number.

21. On or about January 27, 2021, at the direction of Ontavious Plumer, Charlena West and Darquis Davis transported firearms by car from South Carolina to Philadelphia, Pennsylvania, and gave the guns to defendant CORY BROOKINS.

22. On or about January 28, 2021, at the direction of Ontavious Plumer, Charlena West purchased the following firearms:

<b>Date of Purchase</b>	<b>Federal Firearms Licensee</b>	<b>Firearm</b>	<b>Serial Number</b>	<b>Purchaser</b>
1/28/2021	Palmetto State Armory	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCY5101	Charlena West



1/28/2021	Palmetto State Armory	Smith & Wesson, model SD9VE, 9mm semi-automatic pistol	FCZ3184	Charlena West
1/28/2021	Palmetto State Armory	Taurus, model GC3, 9mm semi-automatic pistol	ABN357074	Charlena West
1/28/2021	City Arsenal	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCY1145	Charlena West
1/28/2021	City Arsenal	FN Herstal, model 503, 9mm semi-automatic pistol	CV010947	Charlena West
1/28/2021	Grady's Great Outdoors	FN Herstal, model 503, 9mm semi-automatic pistol	CV014843	Charlena West

23. On or about February 5, 2021, Ontavious Plumer told Charlena West that he would like West to take another trip to Philadelphia. West then told Darquis Davis, "we mite be going to philly soon." Davis responded, "Okay let him know my price is \$500." West responded, "He knows."

24. On February 5, 2021, defendant CORY BROOKINS sent Terrance Darby \$1,100 using Cash App.

25. On or about February 10, 2021, Ontavious Plumer told Charlena West to leave for Philadelphia the next morning.

26. On February 10, 2021, Terrance Darby sent defendant CORY BROOKINS \$650 using Cash App.

27. On or about February 11, 2021, at the direction of Ontavious Plumer, Charlena West and Darquis Davis transported firearms by car from South Carolina to Philadelphia, Pennsylvania, and gave the guns to Terrance Darby.

28. On February 12, 2021, defendant CORY BROOKINS sent \$1,000 to a Cash App account belonging to Ontavious Plumer's sister. At various times throughout the conspiracy, Plumer instructed members of the conspiracy to transfer money to that account.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraphs 1, 13 through 19, and Overt Acts 1 through 25 of Count One are incorporated here.
2. From at least as early as in or around November 2020 through in or around February 2021, in the Eastern District of Pennsylvania, the District of South Carolina, and elsewhere, defendant

**CORY BROOKINS,  
a/k/a "Sport,"**

willfully engaged in the business of dealing in firearms without being licensed to do so under the provisions of Chapter 44, Title 18, United States Code, and aided and abetted the same.

In violation of Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D) and 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violation of Title 18, United States Code, Sections 371, 922(a)(1)(A), and 924(a)(1)(D), set forth in this indictment, defendant

**CORY BROOKINS,  
a/k/a “Sport,”**

shall forfeit to the United States of America the firearms involved in the commission of such violations, including:

#	Firearm	Serial Number
1	Beretta, model APX, 9mm semi-automatic pistol	A098483X
2	Beretta, model APX, 9mm semi-automatic pistol	A098465X
3	Taurus, Judge series, .45 caliber revolver	ABL097569
4	Taurus, Judge series, .45 caliber revolver	ABJ941959
5	Taurus, Judge series, .45 caliber revolver	ABK062912
6	Taurus, model G3, 9mm semi-automatic pistol	ABJ945226
7	Smith & Wesson, model SD40, .40 caliber semi-automatic pistol	FCU0160
8	Smith & Wesson, model SD40, .40 caliber semi-automatic pistol	FCW3015
9	Ruger, Security-9, 9mm semi-automatic pistol	383-61872
10	Smith & Wesson, model MP40, .40 caliber semi-automatic pistol	JFN7241
11	Ruger, Security-9, 9mm semi-automatic pistol	383-84606
12	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCU8997
13	Ruger, Security-9, 9mm semi-automatic pistol	383-69030
14	Glock, model 48, 9mm semi-automatic pistol	BRUD021
15	Smith & Wesson, model SD9, 9mm semi-automatic pistol	FCJ0371
16	Smith & Wesson, model SD40, .40 caliber semi-automatic pistol	FCR2029
17	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	HEY8477
18	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FBB2962
19	Smith & Wesson, model 4040, .40 caliber semi-automatic pistol	USC9960
20	Glock, model 44, .22 caliber semi-automatic pistol	AEMA839
21	Glock, model 43, 9mm semi-automatic pistol	AEWG856
22	Glock, model 43, 9mm semi-automatic pistol	AEWV822

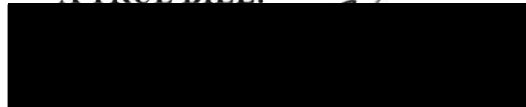


23	Smith & Wesson, model SD9VE, 9mm semi-automatic pistol	FCV9142
24	Glock, model 44, .22 caliber semi-automatic pistol	AEHK404
25	Glock, model 44, .22 caliber semi-automatic pistol	AEFZ395
26	Smith & Wesson, model 4046, .40 caliber semi-automatic pistol	TDS8937
27	Smith & Wesson, model M&P 45, .22 caliber semi-automatic pistol	HST6669
28	Glock, model 19, 9mm semi-automatic pistol	BNYP686
29	Beretta, model APX, 9mm semi-automatic pistol	A118611X
30	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCR9812
31	Taurus, model G3, 9mm semi-automatic pistol	ABN377437
32	Glock, model 19, 9mm semi-automatic pistol	BEBG379
33	Smith & Wesson, M&P9 Shield, 9mm semi-automatic pistol	RJL8351
34	Glock, model 43, 9mm semi-automatic pistol	RJL9085
35	Glock, model 43, 9mm semi-automatic pistol	RJJ3740
36	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCL3090
37	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCR1969
38	Kahr, model CW45, .45 caliber semi-automatic pistol	SG3002
39	Smith & Wesson, model MP40, .40 caliber semi-automatic pistol	NEJ0435
40	Smith & Wesson, model MP40, .40 caliber semi-automatic pistol	HLH1207
41	Smith & Wesson, model MP40, .40 caliber semi-automatic pistol	HLL8291
42	Smith & Wesson, model SD9VE, 9mm semi-automatic pistol	FCN8128
43	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCZ6643
44	Taurus, model GC3, 9mm semi-automatic pistol	ABN361120
45	Ruger, model SR9c, 9mm semi-automatic pistol	339-18799
46	Smith & Wesson, model M&P, semi-automatic pistol	NFD1490
47	Springfield Defender, 9mm semi-automatic pistol	BY565525
48	Smith & Wesson, model MP40C, .40 caliber semi-automatic pistol	HRX7505
49	Ruger, model 9E, 9mm semi-automatic pistol	338-1248
50	Smith & Wesson, model SW9GVE, 9mm semi-automatic pistol	PB23904
51	Taurus, model G2C, 9mm semi-automatic pistol	ABL194818

52	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCY5101
53	Smith & Wesson, model SD9VE, 9mm semi-automatic pistol	FCZ3184
54	Taurus, model GC3, 9mm semi-automatic pistol	ABN357074
55	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCY1145
56	FN Herstal, model 503, 9mm semi-automatic pistol	CV010947
57	FN Herstal, model 503, 9mm semi-automatic pistol	CV014843

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:



GRAND JURY FOREPERSON

A handwritten signature in black ink, appearing to read "JCR" followed by a flourish and the word "for".

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**JACQUELINE C. ROMERO**  
United States Attorney

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

vs.

Cory Brookins  
a/k/a "Sport"

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**INDICTMENT**

Counts

18 U.S.C. § 371 (conspiracy – 1 count); 18 U.S.C. § 922(a)(1)(A) (dealing in firearms without a license  
– 1 count); Notice of forfeiture

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Foreperson

Filed in open court this 9<sup>th</sup> day,  
Of AUGUST A.D. 20 23

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Foreperson

Bail, \$ \_\_\_\_\_

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